

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Anton J. HARRIS

Case No. Case: 2:25-mj-30007
Assigned To : Unassigned
Assign. Date : 1/13/2025
Description: CMP USA V. SEALED
MATTER (DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 922(g)(1)	Felon in possession of a firearm

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Terry Cross-Nelson, Task Force Officer - ATF
Printed name and title



Judge's signature

Hon. Elizabeth Stafford, U.S. Magistrate Judge
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 13, 2025

City and state: Detroit, Michigan

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Task Force Officer/Detective Terry Cross-Nelson, being duly sworn, depose and state as follows:

Introduction and Agent Background

1. I am a detective with the Detroit Police Department (DPD), having served since November 2002. I was promoted to the rank of detective in August 2014 and I am currently assigned to the Firearms Investigative Team (FIT), a specialized unit formed in collaboration with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), where I serve as a credentialed task force officer. FIT represents a federal partnership focused on addressing firearm-related crimes.

2. I have specialized in firearm-related investigations throughout my career. This includes conducting over 400 firearm-related arrests and developing extensive expertise in offenses such as felon in possession of a firearm and illegal firearm trafficking. I hold two degrees, including a master's degree from Cleary University, which, combined with my professional experience, have provided me with a comprehensive understanding of firearm

offenses, investigative techniques, and the legal processes required to effectively address these crimes.

3. This affidavit is based on my personal knowledge, information obtained from witnesses interviewed by law enforcement, communications with other law enforcement officers, and my training and experience in firearm-related investigations. This affidavit is submitted for the limited purpose of establishing probable cause that Anton Jamail HARRIS (DOB: XX/XX/1979) violated 18 U.S.C. § 922(g)(1) by being a felon in possession of a firearm. This affidavit does not contain all facts known to law enforcement regarding this investigation.

Probable Cause

4. On January 1, 2025, at approximately 2:50 p.m., Detroit police officers were conducting patrol near the intersection of Fenkell Avenue and the Southfield Freeway within the city limits of Detroit, in the Eastern District of Michigan.

5. Officers observed a 2022 Tesla Model X with illegal front-tinted windows. The vehicle had no license plate, only a temporary “paper plate.” When officers ran the number on the

temporary plate, they learned that the registration was associated with a different model Tesla. Officers thereupon determined the vehicle was unregistered.

6. Officers conducted a traffic stop, during which the driver and sole occupant, identified as Anton Jamail HARRIS, provided a driver's license, insurance, and a bill of sale from November 2024.

7. The stop continued as officers determined the Vehicle Identification Number (VIN) and ran the VIN through a database, confirming the vehicle was unregistered.

8. During the interaction, HARRIS displayed evasive behavior. He refused to roll down his window early on in the stop and persisted in doing so.

9. The officer who searched the VIN later returned from his patrol vehicle after confirming that the vehicle was unregistered and ordered Harris to exit the Tesla.

10. Harris refused to exit the Tesla. Officers observed Harris repeatedly reaching for a black fanny pack, prompting

concern based on officers' training and experience regarding concealed weapons.

11. After Harris refused multiple commands to exit the vehicle, officers removed him with the assistance of a Taser.

12. Upon securing him, officers recovered a black Glock 23, .40-caliber pistol from Harris' right inner waistband. The firearm was loaded with a magazine containing multiple rounds, including one chambered round. Officers also recovered a black nylon waistband holster.

13. Harris has multiple felony convictions for which he served more than a year in prison.

14. During a post-*Miranda* interview, HARRIS admitted that he refused to comply with officers' commands during the traffic stop, and that he was aware that his felony convictions precluded him from possessing firearms.

15. On January 3, 2025, I contacted an ATF interstate nexus expert, Special Agent Kara Klupacs, and provided a verbal description of the recovered firearm. The expert confirmed that the Glock 23 was manufactured outside the state of Michigan, and

therefore, the firearm traveled in and affected interstate commerce.

Conclusion

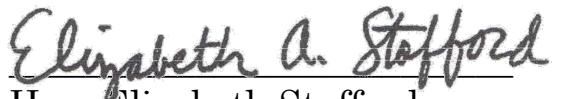
There is probable cause to believe Anton Jamail Harris knowingly and intentionally possessed a firearm as a felon, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Terry Cross-Nelson II, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Elizabeth Stafford
United States Magistrate Judge

Dated: January 13, 2025